

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

PETER LORA, VICTORIA BLOOM
et al

V.

DEAN BOLAND

1:07 CV 2787

JUDGE DAN AARON POLSTER

MOTION FOR LEAVE TO RESPOND TO
GOVERNMENT'S BRIEF

Dean Boland respectfully requests leave of court to file a response to the government's brief, R. 112, for the reasons contained in the attached memorandum.

/s/ Dean Boland

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MEMORANDUM

The court permitted the government to submit a brief in this matter. The government has raised arguments regarding the issues under consideration which were not raised by plaintiff in its brief. Not only are the government's arguments flawed, but they also contain claims about other pending cases which are inaccurate.

In essence, the government and plaintiffs' are both opposing defendant in this matter. The court afforded defendant an opportunity to reply to the plaintiffs' brief. The same opportunity to reply to the government's brief is now sought via this motion for leave.

Therefore, the Defendant respectfully seeks leave to file a reply brief with the same page restrictions applied to the reply brief already filed in response to the plaintiffs' brief.

/s/ Dean Boland

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Proof of Service

A copy of the foregoing will be served on all parties this 23rd of September 2011 by operation of the court's electronic filing system.

/s/Dean Boland
Dean Boland